



March 6, 2025

Via ECF Filing

Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: *Escapex IP, LLC, v. Google, LLC*, Case No. 1:23-cv-10839-VSB –
Letter Motion to File Document Under Seal Regarding Violation of N.Y.R. Prof.
Conduct 4.2 Hearing

Dear Judge Figueredo:

Plaintiff, EscapeX IP, LLC files this Motion to Seal document in support of its evidence for hearing set on March 31, 2025 at 10:30 a.m. before this Court.

The document sought to be sealed is a confidential settlement agreement, which terms serve as the basis of counsel's complaint that Google and its counsel are in violation of N.Y.R. Prof. Conduct 4.2 (Doc. No. 36).

Therefore, EscapeX IP, LLC respectfully requests that this Court grant Plaintiff's Motion and seal the document attached to this filing.

Respectfully submitted,

/s/ William P. Ramey, III
William P. Ramey, III

MEMO ENDORSED

A handwritten signature in black ink, appearing to read "Valerie Figueredo".

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 3/19/25

The motion to seal is GRANTED. The Clerk of Court is respectfully directed to maintain the viewing restriction at ECF No. 43 and to terminate the gavel at ECF No. 42